

# **Desert Sky Community School**

1350 North Arcadia Avenue, Tucson, AZ 85712 ~ (520) 745-3888

October 5th, 2019

Desert Sky Community School

BEN: 17017459

FCC Registration number: 0272211738

Previous year FRN: 1899066572

Form 470 application number: 180028443

CC Docket No.02-6

Original appeal filing confirmation number 20190525077103224

I spoke with FCC representative Mark Nadell recently, and at the request of the commission I am providing additional information regarding my request for waiver of the deadline for filing the FCC form 471. This is a continuation of an FRN from the previous year.

I understand the application was due March 27, 2019, and I had filed it April 12. This information supplements my May 28th filing for waiver.

Desert Sky is a very small charter school of less than 70 students. We have five (5) full-time employees, including two teachers who carry administrative duties. As executive director, I have reduced to part-time and have been delegating my administrative work, since suffering a stroke three years ago. Our administrative team is completed by a part-time receptionist and an accountant on contract.

A year and a half ago, to support the growth, the school decided to implement two new projects. First, there was switching from paper & pencil testing to the use of Chromebooks for state standardized assessments, which required upgrade of our internet access. The E-Rate program was key in making this possible! Secondly, rather than requiring students bring a lunch, the school decided to participate in the National School Lunch program to support our families and provide meal services commensurate with other public schools. We arranged for local catering of meals, including free meals for eligible students.

It seemed that last year as soon as I was able to delegate routine administrative tasks, my weekly 15 hours a week were filled with work related to these two new projects and a few unanticipated events! The installation of fiber internet cable, implementing assessments on Chromebooks, and getting our ERate reimbursements arranged starting in November -- all of this did go rather smoothly, and I do have a volunteer consultant who helps me by telephone with the forms (usually after some phone tag!). The March 27 deadline for the 471 seemed a long way off.

On the other hand, setting up the lunch program was not smooth and required a lot of my time for the county food permit and changes needed, and in working with our receptionist on identifying and maintaining the appropriate lunch count documentation. The National School Lunch Program provided training to guide this process. The training included on-line webinars with tests (February through April), and intensive on-site visits (January 15, February 5, and March 27). On March 27th, my caterer emailed that they were closing and the last day would be two days hence, March 29th! Finding a caterer, procuring an emergency approval from the state for a new catering contract, and figuring out the logistics of getting meals to students were priority.

Two other unprecedented events at school, and two at home took overshadowed the routines of things that were already working well.

- The school was notified November 26th, 2019 that we were required to develop and submit an Integrated Action Plan (IAP), with incremental deadlines (December 5, February 5, and March 5). This work included group work with all teachers, bringing our plan to the board, and school-wide presentation of the plan. While the school had developed a strategic improvement plan in June, we were required to re-do our plan in the designated (time-consuming!) process.
- On January 15th, 2019, the school received an unannounced visit from our authorizer, the Arizona State Board for Charter Schools. Follow up questions and reports extended through early March.
- In October through December, efforts in my personal life were focussed on determining why my teen daughter was having consistent abdominal pain, then meeting with her teachers in December, January and February about her failing grades. In early February, the mother of my son's girlfriend passed away from cancer and our family attended the funeral.
- In November, my 95-year-old father-in-law passed away in Germany and was cremated. He had been a highly-respected high school physics teacher in Bremen. A memorial was planned by my husband and his two brothers (none of whom live in Germany). The memorial was on March 17th, 2019 at an elegant coffee and cake restaurant. It was announced in the newspaper and attended by almost a hundred people offering condolences to the three brothers. The small funeral at the cemetery was later in the week, placing his ashes to rest next to his wife who had passed 40 years before. We returned to Tucson on Sunday March 24th physically and emotionally exhausted, and jet-lagged.
- The trip to Germany for the memorial and funeral was the first time in 13 years that I had taken time away while school was in session. Before I left I had made arrangements that payroll and daily lunch would continue in my absence, and I had trained volunteers to set up and staff the Desert Sky booth at the local street fair (an outreach and enrollment effort). Upon my return there had been no disasters, though the vacuum had broken the first day of my absence and no one wanted to bother me while I was away so the building had not been vacuumed!

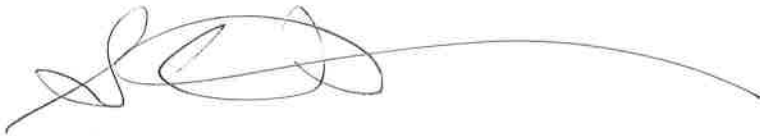
So filing of the 471 that I should have done by early March was pushed ahead repeatedly with

the unanticipated and intense events of November, December, January, February and March! I was fairly new to the process and wanted to work with my volunteer consultant on the Form 471. Between his work schedule and mine, various illnesses, and the unanticipated personal and professional events, the form was not done until April.

I appreciate your understanding and your patience with my learning curve on the process of filing the Form 471.

Please contact me if there are any questions. I can be reached by cell phone (520) 444-9343 or email at [desertskyshelly@gmail.com](mailto:desertskyshelly@gmail.com) or by mail at 1350 N Arcadia Ave. Tucson, AZ 85712.

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Shelly Adrian  
Director